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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

DEMETRIOS VORGAS,

Plaintiff,

v.

COMMUNITY HEALTH OF
CENTRAL WASHINGTON,

Defendant.

NO: 1:21-CV-03013-SAB

**PLAINTIFF'S PROPOSED
VERDICT FORMS**

Plaintiff Demetrios Vorgias, hereby submit Plaintiff's Proposed Verdict Forms 1-4, pursuant to the Court's Jury Trial Scheduling Order (ECF No. 113).

VERDICT FORM NO. 1 – AMERICANS WITH DISABILITIES ACT

Question No. 1: Did Plaintiff have a disability?

Yes ___ No ___

If you answered "Yes" to Question No. 1, please answer Question No. 2. If you answered "No" to Question 1, please sign and date the verdict form below.

Question No. 2: Was Plaintiff a qualified individual?

Yes ___ No ___

If you answered "Yes" to Question No. 2, please answer Question No. 3. If you answered "No" to Question 2, please sign and date the verdict form below.

Question No. 3: Was Plaintiff discharged because of Plaintiff's disability?

Yes ___ No ___

If you answered "Yes" to Question No. 3, please answer Question No. 4. If you answered "No" to Question 3, please sign and date the verdict form below.

Question No. 4: What amount of damages do you award Plaintiff against Defendant on Plaintiff's claim for violation of the Americans with Disabilities Act?

Once this verdict form is completed, the foreperson of the jury should sign and date on the lines below.

Dated: _____

Jury Foreperson

**VERDICT FORM NO. 2– WASHINGTON LAW AGAINST
DISCRIMINATION**

Question No. 1: Did Plaintiff engage in protected activity?

Yes ___ No ___

If you answered “Yes” to Question No. 1, please answer Question No. 2. If you answered “No” to Question 1, please sign and date the verdict form below.

Question No. 2: Did Defendant take an adverse employment action against Plaintiff?

Yes ___ No ___

If you answered “Yes” to Question No. 2, please answer Question No. 3. If you answered “No” to Question 2, please sign and date the verdict form below.

Question No. 3: Was there a causal link between Plaintiff’s protected activity and the adverse employment action?

Yes ___ No ___

If you answered “Yes” to Question No. 3, please answer Question No. 4. If you answered “No” to Question 3, please sign and date the verdict form below.

Question No. 4: What amount of damages do you award Plaintiff against Defendant on Plaintiff’s claim for violation of the Washington Law Against Discrimination?

Once this verdict form is completed, the foreperson of the jury should sign and date on the lines below.

Dated: _____

Jury Foreperson

VERDICT FORM NO. 3– BREACH OF CONTRACT

Question No. 1: Was there a contract between Plaintiff and Defendant?

Yes ___ No ___

If you answered “Yes” to Question No. 1, please answer Question No. 2. If you answered “No” to Question 1, please sign and date the verdict form below.

Question No. 2: Did Defendant breach its duty under the contract?

Yes ___ No ___

If you answered “Yes” to Question No. 2, please answer Question No. 3. If you answered “No” to Question 2, please sign and date the verdict form below.

Question No. 3: Did Plaintiff suffer damages as a result of Defendant’s breach of the contract?

Yes ___ No ___

Question No. 4: What amount of damages do you award Plaintiff against Defendant on Plaintiff’s claim for breach of contract?

Once this verdict form is completed, the foreperson of the jury should sign and date on the lines below.

Dated: _____

Jury Foreperson

VERDICT FORM NO. 4– PUNITIVE DAMAGES

Question No. 1: Was Defendant’s conduct that harmed the Plaintiff malicious, oppressive, or in reckless disregard of Plaintiff’s rights?

Yes ___ No ___

If you answered “Yes” to Question No. 1, please answer Question No. 2. If you answered “No” to Question 1, please sign and date the verdict form below.

Question No. 2: What amount of punitive damages do you award Plaintiff against Defendant?

Once this verdict form is completed, the foreperson of the jury should sign and date on the lines below.

Dated: _____

Jury Foreperson

SO SUBMITTED THROUGH COUNSEL OF RECORD:

Dated: August 24, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED at Yakima, Washington, on Wednesday, August 24, 2022.

By: s/ William D. Pickett
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